

**INTEGRATIVE THERAPEUTICS INC.™**NF Formulas PhytoPharmica  
Tyler Encapsulations Vitaline Formulas9755 SW Commerce Circle, Suite B2  
Wilsonville, OR 97070

P: 503.882.8386 F: 503.882.0467

**ENZYMATIC THERAPY®****&  
PHYTOPHARMICA®**

825 Challenger Drive, Green Bay, WI 54311-8328

P: 920.469.1313 F: 888.570.6460 (Enzymatic)

P: 920.469.9099 F: 920.469.4418 (Phyto)

**ENZYMATIC THERAPY***What **Better** feels like™*

June 21, 2005

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<b>PRODUCT NAME</b>	<b>STATEMENTS</b>	<b>INGREDIENT(S) TO WHICH THE CLAIM REFERS</b>
Thymulus™*	The use of supplemental glandulars has been an accepted method of health support for thousands of years.*	Thymus Polypeptide Fractions, Astragalus (Astragalus membranaceus) Root Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/21/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs, at (920) 406-3608.

Sincerely,

Michael P. Devereux  
Chief Financial Officer

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## ENZYMATIC THERAPY

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June 21, 2005

Office of Nutritional Products, Labeling &  
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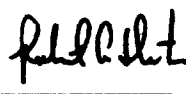
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Thymulus™*	Naturally occurring nutrients in animal glands can help support the same gland in the human body.*	Thymus Polypeptide Fractions, Astragalus (Astragalus membranaceus) Root Extract

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By: 

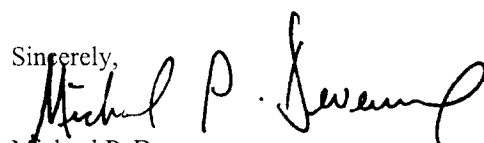
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June 22, 2005

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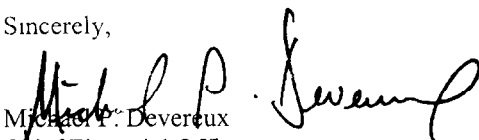
<b>PRODUCT NAME</b>	<b>STATEMENTS</b>	<b>INGREDIENT(S) TO WHICH THE CLAIM REFERS</b>
Thymulus™*	Thymus predigested fractions contain thymic peptides, which may enhance or modulate the immune system when ingested and absorbed.*	Thymus Polypeptide Fractions, Astragalus (Astragalus membranaceus) Root Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
Title: Senior Vice President of Scientific AffairsDate: 6/22/05

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Michael P. Devereux  
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